

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHNNY FLORES, ARIEL GOMEZ and)	
DERRICK LEWIS, for themselves and others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:20-cv-01128
)	
MOTOROLA SOLUTIONS, INC., and)	Honorable Charles R. Norgle, Sr.
VIGILANT SOLUTIONS, LLC,)	
)	
Defendants.)	

**DEFENDANTS' MOTION TO DISMISS
UNDER FED. R. CIV. P. 12(b)(6) AND 12(b)(1)**

Defendants Motorola Solutions, Inc. (“Motorola”) and Vigilant Solutions, LLC (“Vigilant”) (together, “Defendants”) respectfully move the Court, pursuant to Federal Rule of Civil Procedure 12(b)(6) and 12(b)(1), for the entry of an Order dismissing Plaintiffs’ First Amended Class Action Complaint (Dkt. 6).

In support of this Motion, Defendants are filing herewith a Memorandum in Support.

Dated: June 17, 2020

Respectfully submitted,

MOTOROLA SOLUTIONS, INC. and
VIGILANT SOLUTIONS, LLC

By: /s/ David C. Layden
One of their attorneys

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CERTIFICATE OF SERVICE

I, David C. Layden, an attorney, hereby certify that, on June 17, 2020, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ David C. Layden
One of Defendants' Attorneys